

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

JOSE A HERNANDEZ ORTIZ

Debtor(s)

Case No.: 10-11575 BKT

Chapter 13

ANSWER TO MOTION TO DISMISS FILED BY CHAPTER 13 TRUSTEE

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That the Chapter 13 Trustee has filed a Motion to Dismiss for failure to complete documents and file amendments requested by trustee.
2. That debtor filed all amendments to Schedule B, C and Chapter 13 plan. (Dkts #14 &15)
3. That regarding the documents, debtor will provide evidence of his DSO post petition payments in a term of 10 days and insurance quotation has been already requested to Easter American Insurance Co. which will be submitted to trustee as soon its available.

WHEREFORE, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned deny the trustee's motion requesting dismissal.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 3rd day of February of 2011.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.